

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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IN RE: LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST LITIGATION

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)  
) MDL No. 2262  
) 1:11-md-02262 (NRB)  
)

) **ECF CASE**  
)

THIS DOCUMENT RELATES TO:

)  
) Lead Case No. 11 Civ. 5450 (NRB)  
)

MAYOR AND CITY COUNCIL OF  
BALTIMORE and CITY OF NEW BRITAIN  
FIREFIGHTERS' AND POLICE BENEFIT  
FUND, on behalf of themselves and all others  
similarly situated,

) **ECF CASE**  
)

) **ORAL ARGUMENT**  
) **REQUESTED**  
)

Plaintiffs,

v.

CREDIT SUISSE GROUP AG, BANK OF  
AMERICA CORPORATION, BANK OF  
AMERICA, N.A., JP MORGAN CHASE & CO.,  
JPMORGAN CHASE BANK, NATIONAL  
ASSOCIATION, HSBC HOLDINGS PLC, HSBC  
BANK PLC, BARCLAYS BANK PLC LLOYDS  
BANKING GROUP PLC, WESTLB AG,  
WESTDEUTSCHE IMMOBILIENBANK AG,  
UBS AG, THE ROYAL BANK OF SCOTLAND  
GROUP PLC, DEUTSCHE BANK AG,  
CITIBANK NA, CITIGROUP INC.,  
COÖPERATIEVE CENTRALE RAIFFEISEN  
BOERENLEENBANK B.A., THE  
NORINCHUKIN BANK, THE BANK OF  
TOKYO-MITSUBISHI UFJ, LTD., HBOS PLC,  
SOCIÉTÉ GÉNÉRALE S.A, and ROYAL BANK  
OF CANADA,

Defendants.

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE PROPOSED CONSOLIDATED  
SECOND AMENDED COMPLAINT**

Plaintiffs Mayor and City Council of Baltimore and City of New Britain Firefighters' and Police Benefit Fund ("plaintiffs") respectfully move under Fed. R. Civ. P. 15(a) for leave to file a proposed Consolidated Second Amended Complaint ("CSAC"), which is attached in clean and redlined versions as Exhibits A and B to the corresponding Memorandum of Law In Support of Plaintiff's Motion for Leave to File Proposed Consolidated Second Amended Complaint.

Dated: New York, New York  
May 17, 2013

Respectfully submitted,

By: /s/ William Christopher Carmody

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